



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 5
 77 WEST JACKSON BOULEVARD
 CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

LU-9J

Sent by Certified Mail # 7001 0320 0006 0192 6975 and Electronic copy

September 23, 2014

**Mr. Gerald Ruopp
 Techalloy Company, Inc.
 6509 Olson Road
 Union, Illinois 60180**

**United State Environmental Protection Agency's Comments on the 2014 Corrective Measures Implementation Field Investigation Work Plan
 EPA ID # ILD 005 178 975, Administrative Order on Consent (AOC),
 Docket No. R8II-5-99-008**

Dear Mr. Ruopp,

This letter provides the United States Environmental Protection Agency (EPA) comments on the 2014 Corrective Measures Implementation Field Investigation Work Plan, September 5, 2014, for the Techalloy facility in Union, Illinois prepared by Autumnwood ESH Consultants, LLC (Autumnwood). EPA's comments are:

General Comment--this document needs a figure showing proposed Geoprobe locations as well as either a figure or table showing historical detections. Autumnwood state EPA would receive the all of the figures at a later date due to their graphics person being out of the office. To date EPA has not received the figures. Sampling Locations: the leading edge of the plume needs to be defined downgradient of GP-8. GP-8 had a maximum contaminant level (MCL) exceedence of TCE during the last sampling event. A Geoprobe location needs to be placed in the direction of plume movement (N-NW) downgradient of GP-8.

The document needs to be revised to specify how it will be determined in a timely fashion (24-hour turnaround) that the formerly "clean" Geoprobe locations (16 through 22) remain "clean". Clean means no MCL exceedences. If plume migration has occurred so that some or all of these locations are no longer clean, that the sampling locations will be moved downgradient to find the end of the plume. Suggest starting sampling at GP-22, GP-19, GP-20, and the new locations downgradient of GP-8. These samples should have 24-hour turnaround on the sampling. If these locations are clean, the rest of the locations can be sampled on a normal schedule. If they

are not, the Work Plan needs to describe where sampling will be done to define the current extent of the plume.

Please provide a hard copy and electronic copy response to comments in 30-days. Should you have any questions, regarding this letter, need any additional information, or wish to discuss this matter further, please contact me at (312) 353-1243 or contact me by letter or by email at nordine.john@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "John Nordine". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Nordine".

John Nordine, CPG, LPG
Project Manager
Corrective Action Section 2

Cc: Karen Peaceman, U.S. EPA
Jack Thorsen, Autumnwood ESH Consultants
Bob Kay, USGS